

REMARKS

Claims 23-50 are pending. The Examiner has allowed claims 30-48. Claims 24-28 are allowable. Claims 23, 29, 49, and 50 are rejected.

As acknowledged by the Examiner in the Interview Summary mailed December 27, 2006, “Billingsley is not a two-section plunger since one of the sections is a retrieving tool 50 which does not function as a plunger.” The combined retrieving body and collet of Billingsley “are inserted at the wellhead and held in place at the surface by the catcher.” See column 4, lines 42-44. “The combined retrieving body and collet operate to descend by gravity from the surface through the production tubing, down towards a stuck plunger. When the combined retrieving body and collet reach the stuck plunger, the collet having a plurality of extending grapples or fingers will engage the reduced diameter neck of the stuck plunger and also provide a jarring force to the stuck plunger, thereby dislodging the stuck plunger from any stalled position.” See column 3, lines 19-26. One having skill in the art would appreciate that the combined retrieving body and collet of Billingsley is then removed from the wellhead so that it may be separated from the plunger and then again inserted at the wellhead to be held in place at the surface by the catcher. The device of Billingsley does not necessarily travel downwards unless its retrieval services are required in the case of a stuck plunger.

Applicant believes that Billingsley, since it is not a two-section plunger, does not anticipate the claimed device comprising at least two separable *plunger* sections. Nonetheless, Applicant has amended claim 23 to recite that “. . . said latchment is mechanically disengageable at a top of said well, [] separating said sections to each commence a downward travel in said well and substantially in unison one with the other.” As a result, claims 23, 24-28, 29 should now be allowable.

The Examiner states that Hanes “discloses a multi-part plunger assembly comprising a plunger sleeve 53 having an open end and a mechanical coupler or ball 65 sized for retention by the sleeve to releasably secure and [] mate with the top of plug 2.” Applicant believes that Hanes does not anticipate the claimed device. Specifically, Hanes teaches a bridging plug of the wire

line type that is propellant-actuated and used to form a barrier in the well bore. Hanes does not function as a bypass plunger.

Hanes' ball 65 is a means for retaining the upper end of plug 61 in cavity 60 of sleeve 53. See column 4, lines 35-73. Applicant's plug means (and/or ball) on the other hand operates to plug the sleeve's open end, preventing a bypass of fluids therethrough during plunger lift. Claims 49-50 have been amended and should now be allowable.

Applicant notes the Examiner's withdrawal of the restriction requirement. Because claims 31-36 and 39 have been rejoined, the parenthetical expression of the status of the withdrawn claims has been changed to "previously presented".

Applicant respectfully requests the Examiner to pass this application to allowance. If the Examiner should have any questions, he is invited to contact Applicant's representative as set forth below.

Respectfully submitted,



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